

The Honorable Marc L. Barreca
Chapter 13
Hearing Date: December 16, 2010
Hearing Time: 9:30 AM

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:

Sonia Daniels,

Debtor(s).

Case No. 10-16442-MLB

Chapter: 13

**RESPONSE TO OBJECTION TO
CONFIRMATION OF DEBTOR'S
AMENDED PLAN DATED 6/22/10**

COMES NOW Sonia Daniels ("Debtor"), by and through her attorneys, Seattle Debt Law LLC, and responds to the Objection to Confirmation of Chapter 13 Plan by Bank of America Home Loan Servicing, LP ("BAC") as follows.

The Debtors have obtained a second job since the bankruptcy filing which should provide sufficient income to qualify for a HAMP modification. On Tuesday, December 13, 2010 the Debtor is meeting with her attorney to amend her schedules and Chapter 13 plan to account for the additional income. The Debtor will also complete and file a new HAMP loan modification application via the Default Modification Bankruptcy Portal prior to the hearing.

WHEREFORE, for the foregoing reasons, Debtor has no objection to entry of the Order Denying Confirmation of the 6/22/2010 Plan so long as the Debtor has an opportunity for an amended Chapter 13 Plan to be noticed to all creditors.

1 DATED this 13th Day of December, 2010.

2 SEATTLE DEBT LAW, LLC

3 By: /s/ Christina L. Henry
4 Christina Latta Henry, WSBA#31273
Attorneys for Debtor